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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

FEB 07 2022

U.S. DISTRICT COURT  
DISTRICT OF RHODE ISLAND

21  
FEB 20 AM 9:09  
CLERK'S OFFICE  
SUPREME COURT

Simeon Joel Briggs

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

Rhode Island Department of Corrections  
Patricia A. Coyne-Fague (Director)  
Linda Amado, M.S. (Administrator of Classification)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Complaint for a Civil Case

Case No. \_\_\_\_\_  
(to be filled in by the Clerk's Office)

Jury Trial: ☒ Yes ☐ No  
(check one)

## I. The Parties to This Complaint

## A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name Simeon J. Briggs  
 Street Address P.O. Box 430  
 City and County Dillwyn, ~~MO~~ ~~MS~~  
 State and Zip Code Virginia 23936  
 Telephone Number \_\_\_\_\_  
 E-mail Address \_\_\_\_\_

## B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

## Defendant No. 1

Name Rhode Island Department of Corrections  
 Job or Title \_\_\_\_\_  
 (if known) \_\_\_\_\_  
 Street Address \_\_\_\_\_  
 City and County \_\_\_\_\_  
 State and Zip Code \_\_\_\_\_  
 Telephone Number \_\_\_\_\_  
 E-mail Address \_\_\_\_\_  
 (if known) \_\_\_\_\_

## Defendant No. 2

Name Patricia A. Coyne - Fague  
 Job or Title Director  
 (if known) \_\_\_\_\_  
 Street Address 40 Howard Ave  
 City and County Cranston

State and Zip Code Rhode Island 02920  
 Telephone Number \_\_\_\_\_  
 E-mail Address \_\_\_\_\_  
 (if known) \_\_\_\_\_

## Defendant No. 3

Name Linda Amado M.S.  
 Job or Title Administrator of Classification Service  
 (if known) Bernadette Building  
 Street Address 15 Fleming Road  
 City and County Cranston  
 State and Zip Code Rhode Island 02920  
 Telephone Number \_\_\_\_\_  
 E-mail Address \_\_\_\_\_  
 (if known) \_\_\_\_\_

## Defendant No. 4

Name \_\_\_\_\_  
 Job or Title \_\_\_\_\_  
 (if known) \_\_\_\_\_  
 Street Address \_\_\_\_\_  
 City and County \_\_\_\_\_  
 State and Zip Code \_\_\_\_\_  
 Telephone Number \_\_\_\_\_  
 E-mail Address \_\_\_\_\_  
 (if known) \_\_\_\_\_

## II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

☐ Federal question

☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

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B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) \_\_\_\_\_, is a citizen of the State of (name) \_\_\_\_\_.

b. If the plaintiff is a corporation

The plaintiff, (name) \_\_\_\_\_, is incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of business in the State of (name) \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) Linda Amado, is a citizen of the State of (name) Rhode Island. Or is a citizen of (foreign nation) \_\_\_\_\_.

Is the defendant an individual or Corporation ☒ No ☐ Yes  
The defendant (name) Rhode Island Department of Corrections  
is a Corporation of the State of Rhode Island

The defendant Patricia A. Coyne - Fague is a citizen  
of the State of Rhode Island.

The defendant is a Corporation of the Department of  
Corrections under/incorporated of the laws of the State  
of Rhode Island, and has its principal place of business  
in the State Rhode Island

b. If the defendant is a corporation

The defendant, (name) Department of Corrections, is incorporated under the laws of the State of (name) Rhode Island, and has its principal place of business in the State of (name) Rhode Island. Or is incorporated under the laws of (foreign nation) Rhode Island, and has its principal place of business in (name) Rhode Island.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

Plaintiff is a (SPM) Severely and Persistently Mentally ill inmate who lost his Mother and was being harrassed and provoked Mentally Assaulted by Staff phisically and Mentally.

### III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

On June 8th 2021 while having an hour rec in High Security Center on or about ~~8:00 AM~~ 7 to 7:30 AM the plaintiff was removed from RIDOC and involuntary transfered to the Commonwealth of Virginia.



## IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

~~The defendant is not entitled to anything~~ That the defendants pay for Emotional Duress, Mentally Duress, The defendants sent me all the way to Virginia away from My Family, where he had a job, and was in a program. Since Plaintiff's stay in Virginia he's not had a job or the jail has no programs for him.

## V. Certification and Closing.

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

## A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 12-12, 2021.

Signature of Plaintiff

Printed Name of Plaintiff

Simeon Briggs  
Simeon Briggs

## B. For Attorneys

Date of signing: \_\_\_\_\_, 20\_\_.

Defendant No. 8

Name \_\_\_\_\_  
 Job or Title \_\_\_\_\_  
 (if known) \_\_\_\_\_  
 Street Address \_\_\_\_\_  
 City and County \_\_\_\_\_

## Statement of Claim - Continuation

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

On June 8th, 2021 I, Simeon Briggs was transferred to Virginia DOC by Linda Amado in violation of Due process and Policy and Procedures of (RIGL) §42-56-10(22), Powers of director "Out-of-State Transfer 15.03-2 DOC page 1 of 5 part II(B) Inmates who are transferred out-of-state involuntarily are given an administrative hearing and notice of the reason(s) for transfer, This never took place. Also, on page 2 of 5 of Section III. Procedures part A(2) If an inmate is to be involuntarily transferred out-of-state, s/he is provided with a written statement that the proper authorities at the Rhode Island Department of Corrections (RIDOC) have determined that either an inmate's rehabilitative or security goals can best be met in a correctional institution outside Rhode Island. This statement will be given to the affected inmate as soon as practicable. Page 3 of 5 part B(3)



Upon approval by the Director, ADIO, Administrator of Classification Services, or Chief Inspector, the name of the inmate who has been approved for an out-of-State transfer is placed on a list in order of priority based on necessity.

All of the above is from the Policy which was not conducted

in order for this writer to be violated in such a way. The Director Patricia A. Coyne-Fague was on a vacation the week this took place. But when she came back to her office and found out what Linda Amado done, she

did nothing to correct this matter, making her just as wrong being the Director who's suppose to oversee that the policy is being followed.

Now that I'm in Virginia, this writer was taken away from his family, programming, schooling, and

work. This writer was informed by Kyle Bosche, the intra-state Coordinator that Linda Amado told him to keep the inmate locator off so this inmate cannot receive visits from family and friends. This is causing more harm to the writer than good. This inmate is being spoken about as a

(PC) Protective Custody which is putting his safety in harms way.